



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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January 9, 2012

Mr. Fethi Benjemaa
Department of Water Resources
901 P Street
Sacramento, CA 95814

Submitted Via Email: jemaa@water.ca.gov

**RE: DRAFT REPORT-METHODOLOGY FOR QUANTIFYING THE EFFICIENCY OF
AGRICULTURAL WATER USE**

Dear Mr. Benjemaa:

On behalf of more than 74,000 farm families and associate members the California Farm Bureau Federation appreciates the opportunity to comment on your December 21, 2011 draft report to the Legislature regarding "A Methodology for Quantifying the Efficiency of Agricultural Water Use."

Farm Bureau's purpose is to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide safe reliable healthful food and farm products through responsible stewardship of our diverse natural resources. California's farmers and ranchers are absolutely committed to reasonable and efficient use of our scarce water supply.

Since the passage of SBx7 7 in 2009 Farm Bureau has been actively involved with the Department of Water Resources, the Agricultural Water Management Council and other stakeholders in the Agricultural Stakeholders Committee to develop a practical and realistic methodology for quantifying the efficiency of agricultural water use.

We appreciate the improvements made in this current draft, but remain concerned with several aspects in its current form and urge you to more clearly call out the difference between "methods" and "indicators."

SBx7 7 specifically directs the department to "develop a methodology for quantifying the efficiency of agricultural water use." Nowhere in the bill, or the California Water Code does it direct the department to develop or identify indicators. Using indicators without understanding the full implications on sound agricultural practices will produce unintended consequences.

Additionally, flexible goals and a schedule of implementation is a must for a truly successful outcome. Unrealistic goals and rigid timelines will surely produce failure.

Again, we appreciate the opportunity to comment and look forward to continuing to work with you and resolving issues as they arise. You can contact me at (916) 446-4647 or at dmerkley@cfbf.com should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Danny Merkley".

Danny Merkley
Director, Water Resources